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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. JOHN KELLER NORRIS, (1) MATTHEW KNOX NORRIS, (2) Defendants.	Criminal Case No. 07 CR 2913 - L I N F O R M A T I O N Title 18, U.S.C., Sec. 1832(a)(5) - Conspiracy to Steal Trade Secrets

The United States Attorney charges:

Count 1

Beginning on or about March 23, 2007, and continuing to on or about April 8, 2007, within the Southern District of California, defendants JOHN KELLER NORRIS (1) and MATTHEW KNOX NORRIS (2) with intent to convert a trade secret, to wit: confidential bidding information submitted by The Imperial Group to the United States General Services Administration regarding a proposal to build a facility for the United States Department of Homeland Security, Immigration and Customs Enforcement, in El Centro, California, a facility in interstate and foreign commerce; to the economic benefit of J.K. Norris & Company, and knowing that the offense would injure The Imperial Group and the United States General Services Administration, knowingly conspired with each other to steal and to obtain by artifice such information without authority, in violation of Title 18, United States Code, Section 1832(a)(1).

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of this conspiracy, the defendants committed the following overt acts within the Southern District of California:

1. On or about March 23, 2007, defendant JOHN KELLER NORRIS obtained a master key from the janitorial closet of 7825 Fay Avenue, La Jolla, California, and confirmed that it operated the lock on the door of The Imperial Group, a tenant in that building.

2. On or about April 8, 2007, defendant JOHN KELLER NORRIS obtained a master key from the janitorial closet of 7825 Fay Avenue, La Jolla, California, and used the key to illegally enter the offices of The Imperial Group.

3. On or about April 8, 2007, defendant JOHN KELLER NORRIS searched the offices of The Imperial Group for the "bid book" pertaining to the bid of The Imperial Group to build a facility for the United States Department of Homeland Security, Immigration and Customs Enforcement, in El Centro, California, as to which J.K. Norris & Company, a business owned by defendant JOHN KELLER NORRIS and which also employed defendant MATTHEW KNOX NORRIS, also had submitted a bid.

4. On or about April 8, 2007, defendant JOHN KELLER NORRIS,

having failed to locate the "bid book," stole a confidential blueprint of the design of the building submitted by The Imperial Group to the United States General Services Administration in support of its bid.

5. On or about April 8, 2007, defendant MATTHEW KNOX NORRIS stood outside 7825 Fay Avenue, La Jolla, California, remained in cellular contact with defendant JOHN KELLER NORRIS and served as a "lookout" while defendant JOHN KELLER NORRIS illegally entered and searched the offices of The Imperial Group.

All in violation of Title 18, United States Code, Section 1832(a)(5).

DATED: October 18, 2007

KAREN P. HEWITT
United States Attorney

MITCHELL D. DEMBIN
Assistant U.S. Attorney